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Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administered)

**STIPULATION BETWEEN DEBTORS
AND UNITED STATES OF AMERICA
EXTENDING TIME TO RESPOND TO
LEASE ASSUMPTION MOTION**

Re: Dkt. No. 3726

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and
3 debtors in possession (collectively, the “**Debtors**”), on the one hand, and the United States of
4 America (the “**United States**”), on the other hand. The Debtors and the United States are
5 referred to in this Stipulation and Agreement for Order collectively as the “**Parties**,” and each as
6 a “**Party**.” The Parties hereby stipulate and agree as follows:

7 **RECITALS**

8 A. On August 27, 2019, the Debtors filed the *Fifth Omnibus Motion of the Debtors*
9 *Pursuant to 11 U.S.C. § 365(a), Fed. R. Bankr. P. 6006, and B.L.R. 6006-1 for an Order*
10 *Approving Assumption of Certain Real Property Leases* [Dkt. No. 3726] (the “**Lease**
11 **Assumption Motion**”), which is set for a hearing before the Court at 9:30 a.m. on September 24,
12 2019. Any response or opposition to the Lease Assumption Motion is due by 4:00 p.m. (Pacific
13 Time) on September 10, 2019.

14 B. Counsel for the United States has requested, and counsel for the Debtors has
15 agreed, that the time for the United States to respond to the Lease Assumption Motion be
16 extended.

17 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
18 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
19 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
20 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
21 **THAT:**

22 1. The time for the United States to file and serve any response or opposition to the
23 Lease Assumption Motion is extended through 4:00 p.m. (Pacific Time) on September 13, 2019.

24 *[Signatures on next page]*
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Dated: September 6, 2019
KELLER & BENVENUTTI LLP

/s/ Dara L. Silveira
Dara L. Silveira

*Attorneys for Debtors
and Debtors in Possession*

Dated: September 6, 2019
UNITED STATES DEPARTMENT OF
JUSTICE, CIVIL DIVISION

/s/ Danielle A. Pham
Danielle A. Pham

Attorneys for United States